Los Alamos NATIONAL LABORATORY EST. 1943

Engineering Standards Manual

Variance and Exception Form

The requesting organization (or discipline POC on their behalf) shall complete items 1-7:

1. **Variance to ESM** ☒
OR other Document No.: ☐ AP-341-____ ☐ IMP ____ or ☐ : _____
(Note, for Master Specs, Std Details, and Drafting Manual use email to/from Standards Discipline POC)

Chpt. / Title:	Chapter 4, Architectural	Section/Page:	B30 4.0 Fall Protection Page 11

Specific requirement as written:
4.0 Fall Protection
A. Permanent fall protection anchors, handrails or other fall protection devices shall be provided for all roofs not having minimum 42" high parapets and for which foot traffic near the edge is probable. Perimeters of skylights and roof hatches shall be equally protected. Designs shall also consider the need for fall protection during initial construction per the requirements of 29 CFR 1926.

2. **Variance/Exception/Alternate Proposed:** (use continuation sheet if necessary)
Remove the requirement of permanent fall protection anchors from the LANL ESM.

3. **Justification:** (include impacts, i.e., App. F, G, driver(s) if appropriate, project-specific, etc.) (use continuation sheet if necessary)
Permanent fall protection anchors are not required by building codes, life safety codes, and/or federal rules/regulations for new or existing. Promoting the installation of permanent fall protection anchors would place the liability on LANL and not on the Subcontractor, which is just the opposite as practiced by the general industry in the US. The Owner (LANL/LANS) would have to create a set of requirements that would certify, inspect, and maintain the anchors from cradle to grave, assuring that the life safety system(s) would not fail if properly used. Engineering cost would escalate because of all the old structures at LANL and transferring the structural liability to the engineer designing the permanent anchor connection. The structure load capacity would have to be calculated to assure the structure can with stand a 5000 pound impact load per OSHA requirements. As such, the cost effectiveness of permanent anchors is not clear-cut.

4. **Applicable compensating measures:** (use continuation sheet if necessary)
There are several temporary/mobile fall protection anchors on the market that can accomplish the same requirements as permanent fall protection.

5. **Requested for:** (specify dates or lifetime)	Until the ESM Chapter 4, Architectural is revised.

6a. Requestor/Org(Print): David Chavez / ES-PE	6b. Title: Architectural POC	6c. Signature: /David Chavez/	6d. Date: 4/9/08
7a. Requesting FOD or Proj Mgr/Org N/A – Institutional Change	7b. Title:	7c. Signature:	7d. Date:

*For the **ESM,** the **Requestor** forwards request to the ESM Discipline POC for review and concurrence or denial with copy to the Eng. Stds. Mgr (click **here** for listings). **For Other** policies, forward to CENG Office Director.*

Concurrence: ☒ **for the duration of :** current B30 revision **Declined:** ☐ 4/9/08
Standards Point of Contact _David Chavez – ES-PE (name/org) /David Chavez/ (Signature/date)

Additional Comments: (use continuation sheet if necessary)

Issuing Authority Signature:

Daniel Steinberg	/Daniel Steinberg/	4/22/08
CENG Office Leader or Site Chief Engineer for Issuing Authority (ADE)	*Signature*	*Date*

Send a copy of form indicating approved/denied to the Requestor and to POL MS J598.